REMARKS/ARGUMENTS

Claims 1-35 are pending in this application. Claims 1-35 stand rejected. Claims 26 – 35 are cancelled.

Claims 1, 5, 13 and 19 have been amended for further prosecution. Support for the amendments may be found, for example, the description on page 9, paragraph [0045] of the present specification and FIGS. 5A and 5B. The amendment also includes minor changes of a clerical nature. No new matter has been introduced by this amendment.

Rejection of Claims under 35 U.S.C. § 103:

Claims 1-35 (of which claims 26 – 35 have been cancelled) have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Suda* (U.S. 2004/0123059) in view of *Kim et al.* (U.S. 2004/0019736). Applicants respectfully disagree for the reasons set forth below.

A. Claim 1 defines a method for reading data from a memory card that provides non-volatile data storage formed of a single memory array having an address space defined by a contiguous range of addresses. The claimed method includes, among others, (a) accessing volume information stored in a range of addresses that is a proper subset of the range of addresses that defines the address space, (b) determining whether the non-volatile data storage has a single volume address space or a multiple volume address space based on the volume information, and (c) operating the memory card by accessing the entire address space of the non-volatile data storage as the single volume when said determining (b) determines that the single volume address space is present on the memory card, as recited in claim 1 as amended.

The Examiner specifically interprets that Suda's "storage area" includes both first storage area 11a and first internal register 12a within memory card 3 (FIGS. 1 and 4a-4b thereof), teaching the claimed first volume, and thus alleges that Suda's value indicating the number of the storage areas teaches the claimed volume information. However, the Examiner's interpretation is incorrect for the following reasons.

First, an "internal" register of Suda is internal to the memory card 3, not internal to the non-volatile data storage having an address space defined by a contiguous range of addresses as required by claim 1. The storage areas 11 (11a, 11b, ...) and the corresponding internal registers 12 (12a, 12b, ...) of Suda are illustrated as separate, distinct, and independent blocks in all of

Suda's embodiments. Furthermore, as shown in FIG. 3 of Suda, the internal register 12 (18) can be provided for a plurality of storage areas 11a through 11d, and retains a flag indicating "the area which the controller 10 currently judges as the storage area" and "the quantity of the storage areas possessed by the memory card 3" (see page 3, paragraph [0043] of Suda). Thus, the information (flag) in Suda's internal register 12 (18) is dynamic and must be changed depending on which storage area is currently used. In order to access the correct storage area in use, Suda's system must access the internal register 12 prior to accessing any of the storage areas. Thus, Suda's flag (alleged volume information) cannot be stored within in one of the storage areas 11 which may or may not be accessed.

Furthermore, as shown in FIG. 5 of Suda, "the first storage area 11a occupies a hexadecimal address from 00000 to 0FFFF. The second storage area 11b occupies an address from 0FFFF to 1FFFF" (page 4, paragraph [0055]). Thus, apparently Suda's internal registers 12 are not included in the address space defined by the contiguous range of addresses 00000 through xFFFF of the storage area 11 in the case of Suda.

In contrast to Suda, the present invention, as shown in FIGS. 5A and 5B of the specification, the volume information is stored in a range of addresses that is a proper subset of the range of addresses that defines the address space. Claim 1 has been amended to clarify this distinctive feature. In particular, Suda specifically teaches away from storing the volume information in a range of addresses that is a proper subset of the range of addresses that defines the address space since, as described above, the storage area 11 of Suda occupies the contigous range of addresses 0FFFF to xFFFF. The registers 12 occupy other ranges of addresses that ***can not be contiguous with the range of addresses*** specified by Suda for storage areas 12 and thus teaches away from the invention as recited in claim 1 as amended.

Accordingly, Suda fails to teach or suggest (a) accessing volume information stored in a range of addresses that is a proper subset of the range of addresses that defines the address space as recited in claim 1. Claims 13 and 19 also include substantially the same distinctive feature as claim 1. The secondary reference Kim also fails to teach or suggest the claimed volume information as discussed above.

Accordingly it is respectfully requested that the rejection of claims 1, 13, and 19 based on Suda and Kim be withdrawn.

It should be noted that neither Suda nor Kim, alone or in combination, does not teach or suggest (c) operating the memory card by accessing the entire address space of the non-volatile data storage as the single volume when said determining (b) determines that the single volume address space is present on the memory card, as recited in claim 1 as amended. The reasons are discussed in detail in Section B below.

Dependent Claims

Claims 2-12 depend from claim 1, claims 14-18 depend from claim 13, claims 20-25 depend from claim 19, and thus are also patentably distinct from the cited references for at least the same reasons as those recited above for the respective independent claims, upon which they ultimately depend. These dependent claims recite additional limitations that further distinguish these dependent claims from the cited references. For at least these reasons, the dependent claims are not made obvious by the prior cited in the Office Action.

CONCLUSION

Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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